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Attorneys for Defendants

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

YURIDIA CHAVEZ-HERRERA,

Plaintiff,

v.

SHAMROCK FOODS COMPANY, an
Arizona foreign corporation; JOSE PAZ;
DOES II through X; and ROE
CORPORATIONS I through X, inclusive,

Defendants.

Case No. 2:19-cv-01327-GMN-BNW

**STIPULATION AND ORDER
REGARDING TRIAL**

Plaintiff Yurida Chavez-Herrera and Defendants Shamrock Foods Company and Jose Paz, by and through undersigned counsel, hereby stipulate and agree that the following deadlines will apply to the jury trial currently set on the stacked calendar on June 2, 2025, at 8:30 a.m.

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1 **I. MOTIONS IN LIMINE**

2 Motions *in limine* shall be filed by **April 7, 2025**. Responses to motions *in limine* shall be
3 filed by **April 21, 2025**. Replies will be allowed only with leave of the Court.

4 **II. SUGGESTED VOIR DIRE QUESTIONS**

5 The parties shall file no later than **May 5, 2025**, all suggested voir dire questions to be
6 asked of the jury panel by the Court.

7 **III. JURY INSTRUCTIONS AND VERDICT FORMS**

8 By no later than **May 5, 2025**, the parties shall jointly file agreed-upon jury instructions
9 and proposed verdict forms. A copy of the agreed-upon jury instructions and verdict forms shall
10 also be submitted in Microsoft Word format to chambers by email to
11 GMN_Chambers@nvd.uscourts.gov. By no later than **May 5, 2025**, the parties shall file any
12 additional, separate (non-stipulated) proposed jury instructions and verdict forms and also submit
13 them in Word format to the chamber's email address. The latter must include the authority and
14 argument for each instruction. Any modification of instructions from statutory authority the Ninth
15 Circuit Manual of Model Jury Instructions, or any other model instruction, must specifically state
16 the modification made to the original source and the authority and argument supporting the
17 modification.

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1 **IV. TRIAL BRIEF**

2 Each party may file a Trial Brief by no later than **May 19, 2025**.

3 RESPECTFULLY SUBMITTED this 16th day of December, 2024.

4 **FENNEMORE CRAIG, P.C.**

CLAGGETT & SYKES LAW FIRM

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6 By: /s/ Douglas C. Northup
7 John D. Tennert, III (SBN 11728)
8 Douglas C. Northup (Pro Hac Vice)
9 Taylor N. Burgoon (Pro Hac Vice)
10 *Attorneys for Defendants*

By: /s/ Brian Blankenship (w/consent)
Sean K. Claggett
Brian Blankenship
Joseph N. Mott
Scott E. Lundy
Jonathan Winn
Attorneys for Plaintiff

1 AND

2 **BENSON & BINGHAM**
3 Benjamin J. Bingham
4 Ida M. Ybarra, Esq.
5 *Attorneys for Plaintiff*

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7 **IT IS SO ORDERED:**

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UNITED STATES DISTRICT JUDGE

21 Dated: December 18, 2024

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